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Attorneys for APG Financial Bank, N.A.

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH
CENTRAL DIVISION

In re:

Dennis Lee Brewer, Sr. and Cheryl
Lynn Brewer,

Debtors.

Bankruptcy No. 12-23206 jtm

Chapter 13

Filed Electronically

NOTICE MOTION TO COMPEL ASSUMPTION OR REJECTION OF LEASE,
MOTION FOR ALLOWANCE OF ADMINISTRATIVE CLAIM FOR INTERIM
PAYMENTS AND MOTION FOR RELIEF FROM THE AUTOMATIC STAY
AND NOTICE OF OPPORTUNITY FOR HEARING

(Objection Deadline: October 13, 2014)

PLEASE TAKE NOTICE that APG Financial Bank, N.A. ("APG Financial") has filed with the United States Bankruptcy Court for the District of Utah, a Motion to Compel Assumption or Rejection of Lease, Motion for Allowance of Administrative Claim for Interim Payments and Motion for Relief from the Automatic Stay.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

APG Financial is seeking to reject the lease and terminate the automatic stay pertaining to 2000 Dodge Dakota, VIN#1B7HG2AZOYS769587. Please refer to the motion for additional details and additional relief requested.

NO HEARING WILL BE CONDUCTED ON THIS MOTION TO COMPEL ASSUMPTION OR REJECTION OF LEASE, MOTION FOR ALLOWANCE OF ADMINISTRATIVE CLAIM FOR INTERIM PAYMENTS AND MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE COURT ON OR BEFORE THE OBJECTION DEADLINE SET FORTH BELOW.

If you do not want the Court to grant the relief requested in the Motion to Compel Assumption or Rejection of Lease, Motion for Allowance of Administrative Claim for Interim Payments and Motion for Relief from the Automatic Stay then you or your attorney must:

(1) on or before October 13, 2014, you or your lawyer must file with the Bankruptcy Court a written objection to the Motion to Compel Assumption or Rejection of Lease, Motion for Allowance of Administrative Claim for Interim Payments and Motion for Relief from the Automatic Stay explaining your position, at:

United States Bankruptcy Court
350 South Main Street, Room 301
Salt Lake City, UT 84101

If you mail your objection to the Bankruptcy Court for filing you must mail it early enough so that the Court will **receive** it on or before October 13, 2014. You must also mail a copy to the undersigned counsel at 341 South Main, Suite 500, Salt Lake City, UT 84111.

(2) attend the hearing on the Motion to Compel Assumption or Rejection of Lease, Motion for Allowance of Administrative Claim for Interim Payments and Motion for Relief from the Automatic Stay which is set for the **22nd day of October, 2014 at 9:00 a.m.** in Courtroom 341, United States Bankruptcy Court, 350 South Main Street, Salt Lake City, Utah. **There will be no further notice of the hearing** and failure to attend the hearing will be deemed a waiver of your objection.

If you or your attorney do not take these steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Motion to Compel Assumption or Rejection of Lease, Motion for Allowance of Administrative Claim for Interim Payments and Motion for Relief from the Automatic Stay and may enter an order granting that relief. In the absence of a timely filed objection, the undersigned counsel may and will ask the Court to strike the hearing enter an order approving the Motion to Compel Assumption or Rejection of Lease, Motion for Allowance of Administrative Claim for Interim Payments and Motion for Relief from the Automatic Stay without hearing.

DATED September 26, 2014.

TERRY JESSOP & BITNER
Attorneys for APG Financial Bank, N.A.

By: /s/ Richard C. Terry

CERTIFICATE OF SERVICE

I, Richard C. Terry, attorney for APG Financial Bank, hereby certify that on September 26, 2014, I served a copy of the foregoing Notice of Hearing upon the following by first class mail, postage prepaid; or by filing this pleading electronically as an ECF registered attorney of the United States District Court, I caused the same to be served via ECF.

Dennis Lee Brewer, Sr. (Via U.S. Mail)
and Cheryl Lynn Brewer
1087 North 125 West
Clearfield, UT 84015

Theron D. Morrison (Via ECF)
290 25th Street, Suite #102
Ogden, UT 84401

Kevin R. Anderson (Via ECF)
Chapter 13 Trustee
405 South Main Street, Suite #600
Salt Lake City, UT 84111

/s/ Richard C. Terry